UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

April 15, 2023

VIA ELECTRONIC MAIL

Mr. Bryan Naranjo
System Manager Environmental Operations
650 West Peachtree Street NW
Atlanta, GA 30308

Re: **Contained-In Determination, Community Benefits Email Dated April 14, 2023**
East Palestine Train Derailment Site
East Palestine, Ohio

Dear Mr Naranjo:

On April 11,2023 you provided a document entitled *Request for Approval of Contained-In Determination for Surface Water* dated April 11, 2023, to members of the Unified Command for the East Palestine, Ohio Derailment Site. The document was prepared for NSR by its consultant, Arcadis. On April 14, 2023, you provided supplemental comments to support the request via email to U.S.EPA and Ohio EPA.

To assist with technical and engineering evaluation of the treatment system portion of the request I have assembled a team of experienced treatment experts from U.S.EPA's Environmental Response Team (ERT) in Edison, NJ to begin a review early next week. I'll let you know what additional design information they'll need beyond that described in the request, as well as when there will be a need for discussion with NSR and its consultants.

With respect to your supplemental comments regarding additional benefits to the community I have listed your comments below (in italics) followed by requests that NSR provide more detail and support for most of the benefit statements you offered, so we can more fully understand, evaluate and consider this important objective.

- *It will significantly reduce the amount of hazardous waste shipments being transported through the East Palestine community (designated an environmental justice community by EPA) as well as other communities.* **Please explain exactly how transportation volume (number of trucks) moving through the community (on-site vac trucks as well as off-site road tankers) would be reduced. Please include your projection calculations by truck type.**
- *The on-site treatment will allow us to significantly shrink the footprint of temporary storage tanks on-site and allow us to immediately restore those areas and return them to*

the community. **Please provide more detail on how on-site treatment would result in tank farm footprint reduction, which tank farm footprints would shrink, by how much and provide a timeline for that reduction.**

- *It will increase the number of potential disposal locations for the treated water and likely greatly reducing transport distances and associated greenhouse gas emissions.*
- *The centralized transfer operations will reduce the risk of spills and releases.* **Please explain why this would be the case.**
- *It will benefit site safety by reducing the double handling of hazardous liquids and limit transfers and potential exposure events (i.e., vac truck to temporary storage tank to trucks instead of direct loading to trucks).* **Please justify this conclusion with more specific detail.**
- *Increase site safety due to a reduction in waste trucks and vac truck movement on site.* **Again, please explain in more detail why on-site treatment with off-site disposal via trucking will have this result.**
- *Increase storage capacity onsite to allow quicker disposal to recover site post rain events (faster turnaround of trucks & loading operations)* **If current inventory of temporary storage (frac) tanks footprint is reduced as stated above, how would on-site storage capacity beyond what exists currently become increased? Please explain.**
- *Increases ability to maintain water levels onsite to limit potential overflow discharges to Sulfur Run.* **Please explain how on-site treatment of approximately 150,000 gal/day which would need to be hauled off-site by truck provides more overflow protection that just shipping 150,000 gal of untreated water off-site by truck.**
- *This will expedite completion of the overall site clean-up and decrease timeline for overall site waste disposal.* **Please provide detail on why this would be the case**.

Finally, it would be helpful if NSR provided more detail regarding the "operational flow" of on-site treatment, including temporary effluent storage locations and configuration, on-site truck flow, off site truck routes and any other information necessary for USEPA and the Unified Command to completely visualize and evaluate all aspects of NSR's request.

Your responses to the above requests will help us with these initial stages of consideration of your request.

I look forward to discussing this with you and the rest of the East Palestine Unified Command Group. If you have any questions, I can be contacted at dollhopf.ralph@epa.gov or 231-301-0559 (cell).

Sincerely yours,

ralph dollhopf

Digitally signed by ralph dollhopf
Date: 2023.04.15 17:58:12 -04'00'

Ralph Dollhopf
On-Scene Coordinator

cc:

Ann DiDonato, USEPA R3
Jack Kelly, USEPA R3
Chief Keith Drabick, East Palestine Fire Department
Peggy Clark, Columbiana County EMA
Brian Rutledge, Columbiana County EMA
Anne Vogel, Director, Ohio EPA
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